

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

ELILE ADAMS,

Petitioner,

Case No. C19-1263 JCC

V.

## MINUTE ORDER

BILL ELFO, *et al.*,

## Respondents.

The following Minute Order is made at the direction of the Court, the Hon. Michelle L. Johnson, United States Magistrate Judge:

This matter is before the Court on the Honorable John C. Coughenour's order remanding this matter for consideration of whether the fact that Public Law 280 predates federal recognition of the Nooksack Tribe impacts the determination that the Nooksack Tribal Court did not plainly lack jurisdiction over the off-reservation allotted lands where Petitioner was arrested. (Dkt. # 62.) The Court hereby ORDERS Petitioner and Respondents to submit a brief regarding whether this issue has been clearly determined by local law and whether it should be certified to the Washington State Supreme Court. The briefs shall be no more than 7 pages each, excluding

1 certificates of service, and submitted no later than March 8, 2021. The Clerk is DIRECTED to  
2 renote the pending order (dkt. # 62) to March 8, 2021.

3 Dated this 19th day of February, 2021.

4 William M. McCool  
5 Clerk of Court

6 By: Tim Farrell  
7 Deputy Clerk